

REMARKS

Claims 1-15, and 24-33 are pending and were rejected. Each claim has been amended to more clearly recite that the claims are drawn only to modular dedicated video conferencing systems, and not to general purpose computers, cellular telephones, or any of the other irrelevant items in the cited art of record.

As the rejections provided by Examiner are a substantially verbatim repeat of the prior rejections, to which the undersigned has replied repeatedly, this paper does not include a substantive reply to these rejections. Instead, the prior arguments and explanations are incorporated by reference herein. Examiner's response to these arguments will now be addressed.

In response to prior arguments, Examiner states that: "Applicant further delves into his specification to say what is desirable or not desirable with respect to the rejection of the claims such as undesirability of general purpose computers and their complexity of upgrading such systems, lack of portability etc which are not related to applicant's claim limitations." It is clear from this statement that Examiner has not understood Applicant's argument.

Applicant is not "delving into his specification to say what is desirable or not desirable with respect to the rejection." Rather, Applicant is directing the Examiner's attention to portions of the specification that explain the meaning of claim terms that Examiner is erroneously reading onto the references.

Applicant's argument in this regard has two prongs. The first prong of this argument is that the combination of references proposed by the Examiner does not disclose each element of the claims, *i.e.*, none of the references disclose a "video conferencing system" as that term has been used by Applicant. This is the relationship to the claim limitations that Examiner has missed. Applicant's specification makes clear that "video conferencing system" means dedicated appliance-type video conferencing systems. Applicant's specification further makes clear that "video conferencing system" does not include general purpose computer systems that are used for video conferencing. This point has been made repeatedly. However, in the interest of advancing this case, each of the claims has been amended to make it more than explicitly clear that the claims require a *modular dedicated video conferencing system*. None of the references of record teaches anything about modular dedicated video conferencing systems. Agraharam is

directed to a general purpose computer system used for video conferencing, and Hisayoshi is directed to cell phones and digital cameras. Therefore, these references cannot meet the limitations of Applicant's claims.

The second prong of Applicant's argument is that it is improper to combine the references cited by Examiner because they are not drawn to solving the problem to which Applicant's claims are directed. In other words, one skilled in the art would not be motivated to make the combination proposed by the Examiner. This renders the combination insufficient to support a *prima facie* obviousness rejection. This is another reason that the undersigned has directed Examiner's attention to various portions of the specification. As stated therein: "Terminals that are based upon general purpose computers also present disadvantages, such as poor portability, and hardware upgrades that may be difficult for an end user.... There remains a need for a modular dedicated video conferencing system with detachable modules...." This statement of a problem and path to solution makes clear that one skilled in the art would not attempt to solve the problem by resorting to general purpose computer based video conferencing. The subject of Applicant's claims is a modular dedicated video conferencing system. None of the cited references are, but rather are drawn to general purpose computers, cell phones, and digital cameras. Thus one skilled in the art would not be motivated to make the combination proposed by Examiner. Therefore, the proposed combination is improper, and, as Examiner has conceded, neither reference alone discloses all elements of the claims.

In further response to Applicant's arguments, Examiner states: "Hisayoshi teaches docking station adapter configured to removably couple to a docking station that connects in a communicating relationship with video communication network such as radio telephone network." There are two problems with this statement. First, Hisayoshi does not disclose a video communication network, but rather a mobile telephone network. These are not the same, as mobile telephone networks generally lack the bandwidth required for video communication. Second, Agrapharam already teaches a network connection, although not by way of a docking station, as required by the claims. Therefore, one skilled in the art would not be motivated to add the docking station of Hisayoshi to Agrapharam because there is no need to. Because Agrapharam does not disclose a modular system, there is no need for a docking station. Because Agrapharam already has a network connection, there is no need for a connection to the wireless telephone network. Again, one skilled in the art would not combine these two references, and thus their

combination for an obviousness rejection is improper.

Examiner also protests that Applicant has argued about individual references. This is not the case. The undersigned has merely pointed out that the references, whether separately or in combination, fail to disclose each and every element of the pending claims. The undersigned has further pointed out combining the two references is improper. To do so in a coherent manner, it is necessary that some sentences, and maybe even whole paragraphs, only address one reference or the other. However, Applicant's argument, as a whole, addresses the combination. For example, it can be shown that the combination does not disclose an element by showing that neither constituent of the combination includes the required element. Furthermore, it can be shown that the combination is improper because one skilled in the art would not be motivated to make the combination by showing that one reference, or the other, or both, is from a technical field to which one skilled in the art would not look for a solution.

Finally, Examiner states that: "Applicant's further arguments goes into specifications to say how the modular videoconferencing system is designed to overcome problems etc which does not address applicant's claim limitations." First, as noted above, Applicant's references to the specification have been to explain the meaning of claim terms to the Examiner, which does address Applicant's Claim limitations. Second, as noted above, the primary claim term at issue is the meaning of video conferencing system, and whether this term includes general purpose computer based video conferencing terminals, which are disclosed by Agraharam. Because the claims have been amended to clearly recite a modular dedicated video conferencing system, Examiner's remarks in this regard are moot, as the references clearly fail to disclose, teach, or suggest such a system.

Reconsideration of the claims in light of the above remarks and allowance of all pending claims is requested.

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Date

/Billy C. Allen III/
Billy C. Allen III
Reg. No. 46,147

WONG, CABELLO, LUTSCH,
RUTHERFORD & BRUCCULERI, L.L.P.
20333 State Highway 249, Suite 600
Houston, Texas 77070
Voice: 832-446-2409
Facsimile: 832-446-2424